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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13  
14 v.  
KENNETH JOHNSON, ET AL.,  
15  
16 Defendants.

CASE NO. 1:20-CR-00238-JLT

JOINT STATEMENT OF CASE

DATE: January 14, 2025  
TIME: 8:00 a.m.  
COURT: Hon. Jennifer L. Thurston

17 This case alleges that the Aryan Brotherhood (the “AB”) is a criminal organization whose  
18 members and associates engaged in acts involving murder, fraud, robbery, drug trafficking, and assault.  
19 It further alleges the AB is an enterprise, or a group of individuals associated in fact that engages in, and  
20 the activities of which affect, interstate and foreign commerce. An enterprise constitutes an ongoing  
21 organization whose members function as a continuing unit for a common purpose of achieving the  
22 objectives of the enterprise.

23 The Third Superseding Indictment alleges that defendants Kenneth Johnson, Francis Clement,  
24 Brandon Bannick, and John Stinson knowingly agreed to associate with, and were each in fact a member  
25 or an associate of, the AB.

26 Count One charges all defendants with Conspiring to Engage in a Racketeering Enterprise,  
27 alleging that beginning at a time unknown, but no later than in or around 2015, and continuing to at least  
28 on or about March 1, 2023, in the State and Eastern District of California and elsewhere, the defendants,

1 Kenneth Johnson, Francis Clement, Brandon Bannick, and John Stinson, being persons employed by  
2 and associated with the AB, which engaged in, and the activities of which affected, interstate and  
3 foreign commerce, together with others known and unknown, did knowingly, intentionally, and  
4 unlawfully combine, conspire, confederate, and agree to conduct and participate, directly and indirectly,  
5 in the conduct of the affairs of the AB through a pattern of racketeering activity, consisting of acts  
6 involving murder, robbery, assault, fraud, and drug trafficking.

7 Counts Two and Three charge defendants Kenneth Johnson, Francis Clement, and Brandon  
8 Bannick with Murder in Aid of Racketeering, alleging that on or about October 4, 2020, defendants  
9 together with others known and unknown, for the purpose of gaining entrance to and maintaining and  
10 increasing position in the AB, while aiding and abetting one another, murdered Allan Roshanski and  
11 Ruslan Megomedgaozhiev.

12 Count Four charges defendant Francis Clement with Murder in Aid of Racketeering, alleging  
13 that on or about February 22, 2022, defendant together with others known and unknown, for the purpose  
14 of gaining entrance to and maintaining and increasing position in the AB, while aiding and abetting one  
15 another, murdered Michael Brizendine.

16 Counts Five and Six charge defendants Francis Clement and Brandon Bannick with Murder in  
17 Aid of Racketeering, alleging that on or about March 8, 2022, defendants together with others known  
18 and unknown, for the purpose of gaining entrance to and maintaining and increasing position in the AB,  
19 while aiding and abetting one another, murdered Ronnie Ennis and James Yagle.

20 The indictment in this matter is not evidence and defendants have pleaded not guilty to the  
21 counts for which they are charged. Defendants are presumed innocent unless and until the United States  
22 proves their guilt beyond a reasonable doubt.

23 Dated: December 27, 2024

PHILLIP A. TALBERT  
United States Attorney

24  
25 By: /s/ STEPHANIE M. STOKMAN  
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